

EXHIBIT I

Excerpts from Deposition of Peter DelVecchia

PETER DELVECCHIA

November 19, 2019

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CASE NO. 2:19-CV-01322-KJD-NJK

PETER DELVECCHIA, individually and
as next friend of A.D., a minor,

Plaintiffs,

vs.

FRONTIER AIRLINES INC. and JOHN DOES
1 through 5, inclusive,

Defendants.

Videotaped Deposition of

PETER DELVECCHIA

(Taken by Plaintiffs)

Raleigh, North Carolina

Tuesday, November 19, 2019

Reported in Stenotype By:

Denise Y. Meek

Court Reporter and Notary Public

PETER DELVECCHIA

November 19, 2019

<p style="text-align: right;">Page 178</p> <p>1 MS. SHELKE: Okay.</p> <p>2 BY MS. SHELKE:</p> <p>3 Q. Peter, if you will go to page 51, which</p> <p>4 is page 2 of Deposition Exhibit Number 3 --</p> <p>5 A. Page fifty what?</p> <p>6 Q. The little page number.</p> <p>7 MR. McKAY: The little, tiny Bates</p> <p>8 stamp numbers.</p> <p>9 THE WITNESS: Oh, sorry.</p> <p>10 BY MS. SHELKE:</p> <p>11 Q. And this is a long text message that</p> <p>12 appears to be from you to Amanda.</p> <p>13 A. Uh-huh.</p> <p>14 Q. The second sentence -- or third</p> <p>15 sentence of it says: "At the end of the day,</p> <p>16 it was a black steward who was pissed off and</p> <p>17 filed the claim."</p> <p>18 Why do you think the flight attendant</p> <p>19 was "pissed off"?</p> <p>20 A. By this time A.D. and I had talked</p> <p>21 about the racist piece of it, and I concurred</p> <p>22 completely that this was a racist incident.</p> <p>23 Q. How does being pissed off translate to</p> <p>24 racism? If you'll explain that to me.</p>	<p style="text-align: right;">Page 180</p> <p>1 And I've tried to engage with people,</p> <p>2 particularly when it happens at Costco or</p> <p>3 Food Lion, which is a grocery store, if you</p> <p>4 don't know, and I try to explain to them that</p> <p>5 he was a starving kid in Africa, and this</p> <p>6 likely saved his life.</p> <p>7 But I will also tell you, there's just</p> <p>8 as many people, if not more -- black people --</p> <p>9 that come over and hug me in public and tell me</p> <p>10 that I've done a wonderful thing.</p> <p>11 So it's something of a balance. And,</p> <p>12 you know, the reaction it generates is -- it</p> <p>13 seems to be one extreme or the other. I'm</p> <p>14 either getting hugged and kissed or I'm getting</p> <p>15 garbage thrown at me.</p> <p>16 Q. And in your mind, the flight attendant</p> <p>17 was pissed off about the fact that you as a</p> <p>18 white gentleman had adopted a black child?</p> <p>19 A. Yes. And, clearly, he knew he was my</p> <p>20 son, because A.D. and I had both told him that</p> <p>21 he was my son.</p> <p>22 And you just reminded me of something.</p> <p>23 THE WITNESS: And, John, I don't know</p> <p>24 if you want me to run it past you or I can</p>
<p style="text-align: right;">Page 179</p> <p>1 A. Oh, it's -- okay, yeah, I see where</p> <p>2 you're going. Well, it's -- I can't answer</p> <p>3 that with certainty, I can only tell you what I</p> <p>4 feel, if that's acceptable to you.</p> <p>5 Q. Yes.</p> <p>6 A. I think that -- okay. So if you can</p> <p>7 give me some leeway to just -- as a basis for</p> <p>8 my opinion here.</p> <p>9 I have been approached by many, many</p> <p>10 black people who told me that I own a slave.</p> <p>11 And I've been approached by black people who</p> <p>12 have thrown garbage at me from cars that were</p> <p>13 moving. One actually threw a full bottle of</p> <p>14 Pepsi at me and A.D. when we were riding our</p> <p>15 bikes. I have had people approach me in Costco</p> <p>16 and tell me what a piece of -- pardon my</p> <p>17 language -- what a piece of shit I am for</p> <p>18 taking a black child out of his element. And</p> <p>19 it's just occurred to me over time that there's</p> <p>20 probably some resentment. A.D. would tell you</p> <p>21 he has a whole different outlook on this, which</p> <p>22 you should ask him, if you want, but I just</p> <p>23 think that there's some resentment about taking</p> <p>24 him out of a black home or possible black home.</p>	<p style="text-align: right;">Page 181</p> <p>1 just say what I want to say.</p> <p>2 MR. McKAY: Well, wait for a question.</p> <p>3 THE WITNESS: It's something that just</p> <p>4 triggered a memory, that's all.</p> <p>5 BY MS. SHELKE:</p> <p>6 Q. Sticking with page 2 of Deposition</p> <p>7 Exhibit Number 3.</p> <p>8 A. Page 2.</p> <p>9 Q. The page you're on right now.</p> <p>10 There's a sentence that reads: "And</p> <p>11 the best you had a coach stretch over the whole</p> <p>12 front of him."</p> <p>13 Can you tell me what you intended to</p> <p>14 mean there?</p> <p>15 A. If you take your phone and say A.D.,</p> <p>16 how it comes up is -- I mean, it's voice</p> <p>17 texting. And I'm terrible with the phone, so I</p> <p>18 talk into it. And then because I'm lazy, I</p> <p>19 don't read it over.</p> <p>20 So this was supposed to say: "And A.D.</p> <p>21 had a coat stretched over the whole front of</p> <p>22 him, but a trumped up charge that I was playing</p> <p>23 with his crotch."</p> <p>24 Q. Similarly, if you'll turn to the next</p>